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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CELERINA NAVARRO, JANET STEVENS,
ARMANDO COVARRUBIAS, EVELYN
ESTRADA, GABRIEL RANGEL JAIME,
ALMA ALDACO, and all others similarly
situated,

Plaintiffs,

vs.

THE CITY OF MOUNTAIN VIEW,
Defendant.

No.: 5:21-cv-05381-NC

NOTICE OF TENTATIVE SETTLEMENT

The Honorable Nathanael M. Cousins
Courtroom: 5

NOTICE OF TENTATIVE SETTLEMENT

Counsel for Plaintiffs Celerina Navarro, Janet Stevens, Armando Covarrubias, Evelyn Estrada, Gabriel Rangel Jaime, and Alma Aldaco (“Plaintiffs”), and Defendant the City of Mountain View (“the City”) (collectively, the “Parties”) have reached an agreement in principle to settle the above-captioned matter on a class-wide basis, subject to approval by their clients and the Court. Counsel intend to finalize the written settlement agreement and will seek to secure all necessary signatures and formal client approvals between now and August 30, 2022, the day the current stay of litigation and enforcement expires. ECF Nos. 97 & 98. The Parties will file an updated Notice of Tentative Settlement by August 30, 2022, to provide the Court with an update on their progress and to either request a modest extension of court deadlines if necessary to finish securing approval from their clients, or to notify the Court that approvals have been secured and to request that the Court vacate the Case Management Conference currently set for September 14, 2022 and all deadlines set in this Court’s June 27, 2022, Order Granting in Part and Denying in Part Stipulation to Continue Case Schedule.

Within thirty (30) days after all Parties have executed the settlement agreement, the Parties will jointly move the Court for an order granting preliminary approval of their settlement agreement; provisionally certifying a Settlement Class; appointing Plaintiffs as Class Representatives; appointing Plaintiffs’ Counsel as Class Counsel; approving a plan and schedule for providing notice of the settlement to Class Members; and setting a date and time for a hearing on the fairness of the settlement and a motion for final approval of the settlement. Counsel will also negotiate Plaintiffs’ claim for entitlement to attorneys’ fees and costs. If the Parties are unable to resolve this claim through negotiation, Plaintiffs will present this claim by noticed motion.

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1 Dated: August 24, 2022

Respectfully submitted,

2 /s/ Nadia Aziz

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11 **LOCAL RULE 5-1(h)(3) ATTESTATION**

12 I, Margaret R. Prinzing, attest that all signatories listed herein, and on whose behalf this
13 filing is submitted, concur in this filing's content and have authorized this filing.

14 /s/ Margaret R. Prinzing

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